

Exhibit A

UNITED STATES DISTRICT COURT
for the
Northern District of California

IN RE: 17 U.S.C. § 512(h) SUBPOENA TO PONYNET, US

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| <u>Plaintiff</u> v. <u>Defendant</u> |)))))) |
|--|----------------------------|

Civil Action No.

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
AND SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

To:

PONYNET, US

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Subject matter covered by the notification letter included herein under the Attachment.

| | |
|--|--|
| Place: King & Wood Mallesons LLP 500 Fifth Avenue, 50th Floor New York, NY 10110 | Date and Time: 01/23/2025 9:00 am EST |
|--|--|

The deposition will be recorded by this method: videotape and/or stenographic means

Production: YOU, OR YOUR REPRESENTATIS, ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment

| | |
|--|--|
| Place: King & Wood Mallesons LLP 500 Fifth Avenue, 50th Floor New York, NY 10110 | Date and Time: 01/10/2025 9:00 am EST |
|--|--|

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) _____
China Literature Ltd. _____, who issues or requests this subpoena, are:

Yiren Yu, King & Wood Mallesons LLP, 2500 Sand Hill Road, Suite 111, Menlo Park, CA 94025, yiren.yu@us.kwm.com, 650-858-1285

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*) _____
on (*date*) _____.

I served the subpoena by delivering a copy to the named individual as follows: _____

on (*date*) _____; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____
Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT

INFORMATION TO BE PRODUCED UNDER SUBPOENA TO PONYNET, US

Information sufficient to identify the alleged infringers of the e-books described in the attached notification letter. This would include, but not limited to, the individuals' names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account history.



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www.kwm.com

November 27, 2024

Private & Confidential

To PONYNET, US
FranTech Solutions
admin@frantech.ca
abuse@frantech.ca

Re: Copyright Infringement by xiuting.cc

Dear Sir or Madam:

We are counsel for China Literature Ltd. ("China Literature"), an entertainment company that develops and adapts original online literature into a wide range of digital entertainment formats, including comics, animation, TV series, films, and games, primarily for the Mandarin-speaking world. Through its platforms QQ Reading, Qidian, and collaborations with Tencent, it creates a rich IP ecosystem that engages users across various media. We write concerning an urgent matter of copyright infringement by xiuting.cc using PONYNET, US ("Ponynet")'s services.

We have determined that the website located at xiuting.cc ("Xiuting") has infringed China Literature's copyrighted e-books. This notification is issued pursuant to Section 512(c)(3)(A) of the Digital Millennium Copyright Act ("DMCA") by virtue of Xiuting's use of Ponynet as an internet service provider. These activities violate U.S. copyright law.

As of November 13, 2024, Xiuting provides free access to wholly unauthorized digital copies of hundreds of China Literature's e-books. Xiuting allows all website visitors access to infringing content without registration. A representative list of the infringing URLs from Xiuting is provided in Attachment A hereto. This list does not provide a complete statement of infringing activities.

This notice is based upon our good faith belief that the use of the copyrighted works in the manner described herein is not authorized by China Literature as the copyright owner, its agents, or under law. We further confirm that the information provided herein is accurate and, under penalty of perjury, we are authorized to act on behalf of China Literature, which owns or controls exclusive rights under copyright that are being infringed.

In light of the above circumstances, we demand that Ponynet discontinue Xiuting's use of its services for the infringing activities described herein. Upon receipt of this letter, please contact us to confirm that Ponynet will take all necessary steps to preclude Ponynet's services from being used to facilitate the infringing activities.

* * * *



Nothing herein is intended to be, or shall be construed as, any form of limitation or waiver of any rights, claims, or remedies of China Literature, all of which are hereby expressly reserved. Should you have any questions or require additional information, you can reach me at the following coordinates. Thank you for your cooperation and attention to this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Vincent Filardo".

Vincent Filardo, Jr. | Partner
King & Wood Mallesons LLP
T +1 347 926 7570
vincent.filardo@us.kwm.com

cc: Amanda Connor
Yi He, Esq.
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This communication and any attachments are confidential and may be privileged.



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www.kwm.com

Attachment A

List of infringing works on xiuting.cc

| Ref | Name of the copyright work | Author pseudonym | URLs to the infringing novel | URLs to authorized novel |
|-----|----------------------------|------------------|---|---|
| 1 | 宿命之环 | 爱潜水的乌贼 | https://www.xiuting.cc/xiaoshuo/1/ | https://m.qidian.com/book/1036370336 |
| 2 | 灵境行者 | 卖报小郎君 | https://www.xiuting.cc/xxiaoshuo/2/ | https://m.qidian.com/book/1031940621 |
| 3 | 光阴之外 | 耳根 | https://www.xiuting.cc/xxiaoshuo/3/ | https://m.qidian.com/book/1031777108 |
| 4 | 深空彼岸 | 辰东 | https://www.xiuting.cc/xxiaoshuo/4/ | https://m.qidian.com/book/1027339371 |
| 5 | 仙者 | 忘语 | https://www.xiuting.cc/xiaoshuo/5/ | https://m.qidian.com/book/1034539101 |
| 6 | 择日飞升 | 宅猪 | https://www.xiuting.cc/xxiaoshuo/6/ | https://m.qidian.com/book/1032778366 |
| 7 | 苟在妖武乱世修仙 | 文抄公 | https://www.xiuting.cc/xxiaoshuo/7/ | https://m.qidian.com/book/1036305137 |
| 8 | 机武风暴 | 骷髅精灵 | https://www.xiuting.cc/xxiaoshuo/8/ | https://m.qidian.com/book/1034419446 |
| 9 | 半仙 | 跃千愁 | https://www.xiuting.cc/xxiaoshuo/9/ | https://m.qidian.com/book/1020180183 |
| 10 | 诸界第一因 | 裴屠狗 | https://www.xiuting.cc/xxiaoshuo/11/ | https://m.qidian.com/book/1029701421 |
| 11 | 神秘复苏 | 佛前献花 | https://www.xiuting.cc/xxiaoshuo/12/ | https://m.qidian.com/book/1012584111 |
| 12 | 宇宙职业选手 | 我吃西红柿 | https://www.xiuting.cc/xxiaoshuo/13/ | https://m.qidian.com/book/1031581171 |
| 13 | 深海余烬 | 远瞳 | https://www.xiuting.cc/xxiaoshuo/14/ | https://m.qidian.com/book/1034360760 |
| 14 | 人道大圣 | 莫默 | https://www.xiuting.cc/xxiaoshuo/15/ | https://m.qidian.com/book/1030665314 |
| 15 | 明克街 13 号 | 纯洁滴小龙 | https://www.xiuting.cc/xxiaoshuo/18/ | https://m.qidian.com/book/1030870265 |
| 16 | 我的模拟长生路 | 愤怒的乌贼 | https://www.xiuting.cc/xxiaoshuo/19/ | https://m.qidian.com/book/1033422902 |
| 17 | 光明壁垒 | 会摔跤的熊猫 | https://www.xiuting.cc/xxiaoshuo/20/ | https://m.qidian.com/book/1031732984 |
| 18 | 苟在仙界成大佬 | 沉入太平洋 | https://www.xiuting.cc/xxiaoshuo/21/ | https://m.qidian.com/book/1033737159 |
| 19 | 赤心巡天 | 情何以甚 | https://www.xiuting.cc/xiaoshuo/22/ | https://m.qidian.com/book/1016530091 |
| 20 | 我家娘子，不对劲 | 一蝉知夏 | https://www.xiuting.cc/xxiaoshuo/24/ | https://m.qidian.com/book/1032982789 |
| 21 | 7 号基地 | 净无痕 | https://www.xiuting.cc/xxiaoshuo/25/ | https://m.qidian.com/book/1033533370 |
| 22 | 人族镇守使 | 白驹易逝 | https://www.xiuting.cc/xxiaoshuo/26/ | https://m.qidian.com/book/1026225232 |
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| 25 | 乱世书 | 姬叉 | https://www.xiuting.cc/xxiaoshuo/0/30/ | https://m.qidian.com/book/1036010291 |
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| 27 | 唐人的餐桌 | 矛与 2 | https://www.xiuting.cc/xxiaoshuo/0/33/ | https://m.qidian.com/book/1033914374 |
| 28 | 仙子, 请听我解释 | 弥天大厦 | https://www.xiuting.cc/xxiaoshuo/0/35/ | https://m.qidian.com/book/1035294721 |
| 29 | 国民法医 | 志鸟村 | https://www.xiuting.cc/xxiaoshuo/0/36/ | https://m.qidian.com/book/1033893441 |
| 30 | 请公子斩妖 | 裴不了 | https://www.xiuting.cc/xxiaoshuo/0/38/ | https://m.qidian.com/book/1033498464 |
| 31 | 我有一个修仙世界 | 纯九莲宝灯 | https://www.xiuting.cc/xxiaoshuo/0/40/ | https://m.qidian.com/book/1033296433 |
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| 52 | 趋吉避凶，从天师府开始 | 八月飞鹰 | https://www.xiuting.cc/xxiaoshuo/66/ | https://m.qidian.com/book/1037806577 |
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| 55 | 大道纪 | 裴屠狗 | https://www.xiuting.cc/xxiaoshuo/69/ | https://m.qidian.com/book/1016861609 |
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| 60 | 重回 1982 小渔村 | 米饭的米 | https://www.xiuting.cc/xiaoshuo/75/ | https://m.qidian.com/book/1034727274 |
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| 62 | 别人练级我修仙，苟到大乘再出山 | 三五玄七 | https://www.xiuting.cc/xxiaoshuo/77/ | https://m.qidian.com/book/1037491938 |
| 63 | 炮火弧线 | 康斯坦丁伯爵 | https://www.xiuting.cc/xxiaoshuo/78/ | https://m.qidian.com/book/1038863996 |
| 64 | 普罗之主 | 沙拉古斯 | https://www.xiuting.cc/xxiaoshuo/79/ | https://m.qidian.com/book/1038229163 |
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| 66 | 从水猴子开始成神 | 甲壳蚁 | https://www.xiuting.cc/xxiaoshuo/82/ | https://m.qidian.com/book/1037570737 |
| 67 | 重启神话 | 凤嘲凰 | https://www.xiuting.cc/xxiaoshuo/83/ | https://m.qidian.com/book/1038079835 |
| 68 | 明尊 | 辰一十一 | https://www.xiuting.cc/xxiaoshuo/84/ | https://m.qidian.com/book/1017325449 |
| 69 | 满唐华彩 | 怪诞的表哥 | https://www.xiuting.cc/xiaoshuo/85/ | https://m.qidian.com/book/1037135031 |
| 70 | 速通修仙！ | 平层 | https://www.xiuting.cc/xxiaoshuo/86/ | https://m.qidian.com/book/1037333167 |
| 71 | 金丹是恒星，你管这叫修仙？ | 走地鹤 | https://www.xiuting.cc/xxiaoshuo/87/ | https://m.qidian.com/book/1036993574 |
| 72 | 神话：灵性支配者 | 深蓝圆舞曲 | https://www.xiuting.cc/xxiaoshuo/88/ | https://m.qidian.com/book/1038281225 |
| 73 | 憎恨我吧，魔女小姐！ | 四千局后 | https://www.xiuting.cc/xxiaoshuo/90/ | https://m.qidian.com/book/1038677781 |
| 74 | 他们越反对，越是说明我做对了 | 金属雨点 | https://www.xiuting.cc/xxiaoshuo/91/ | https://m.qidian.com/book/1038970972 |
| 75 | 故障乌托邦 | 狐尾的笔 | https://www.xiuting.cc/xxiaoshuo/92/ | https://m.qidian.com/book/1038465154 |
| 76 | 高武纪元 | 烽仙 | https://www.xiuting.cc/xxiaoshuo/93/ | https://m.qidian.com/book/1039141715 |
| 77 | 吞噬星空 2 起源大陆 | 我吃西红柿 | https://www.xiuting.cc/xxiaoshuo/94/ | https://m.qidian.com/book/1039391177 |



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